

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

APPEAL FROM THE PRIMARY EXAMINER TO THE
BOARD OF PATENT APPEALS AND INTERFERENCES

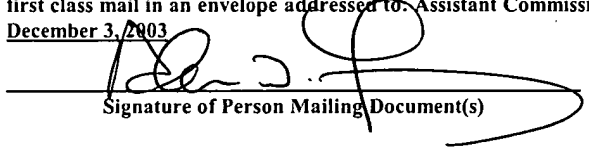
In re application of: KAMATH, S.
Serial Number: 09/833,034
Filing Date: April 10, 2001
Title: Methods, Devices and Systems for
Online Express Ordering of Goods and Services

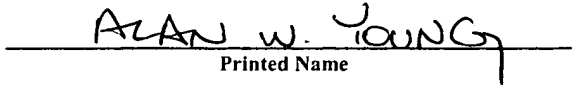
Art Unit No.: 3629
Examiner: Naresh, Vig.
Att'y Docket: ORCL5665CIP

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APPELANT'S BRIEF

Mail Stop Appeal Brief
Commissioner of Patents
PO Box 1540
Alexandria, VA 22313

Sir:

This application was filed on April 10, 2001. In an Office Action dated April 23, 2002, claims 1, 2, 4-25, 27-48 and 50-69 were rejected as being anticipated over Hartman et al., US patent 5,906,411. Claims 3, 26 and 49 were rejected as being unpatentable over Hartman et al. in view of US patent 6,029,141 to Bezos et al. An amendment responsive to the Office Action of April 23, 2002 was filed on July 31, 2002 canceling claims 2, 8, 25, 31, 48 and 54 and amending claims 1, 3, 17, 24, 26, 40, 47, 49 and 63. A second Non-Final Office Action was issued on October 16, 2002, in which Claims 1, 4-7, 9-24, 27-30, 32-47, 50-53 and 55-69 were rejected as unpatentable in view of Hartman in view of Amazon, claims 3, 26 and 49 were rejected as being unpatentable over the a combination of Hartman, Bezos and Amazon. An amendment responsive to the Office Action of

October 16, 2002 was filed on February 13, 2003, in which claim 3 was amended and the patentability of the claims argued. A Final Office Action was then issued on June 18, 2003, finally rejecting the claims. A Notice of Appeal was timely filed on September 4, 2003, with the requisite fee. The present Appeal Brief is timely filed with a one-month extension of time.

Real Party in Interest

The real party in interest is Oracle International Corporation; a corporation that is organized under the laws of the state of California and that has its principal place of business at 500 Oracle Parkway, Redwood Shores CA 94065 USA. The real party in interest Oracle International Corporation obtained the entire right, title and interest in and to the present patent application by virtue of an assignment from the original assignee Oracle Corporation on February 18, 2003, which assignment was recorded at the USPTO on March 4, 2003 at Reel 013808, Frame 0035.

Status of Claims

Claims 1, 4-7, 9-24, 27-30, 32-47, 50-53 and 55-69 stand finally rejected under 35 USC §103(a) over Hartman in view of Amazon, and claims 3, 26 and 49 stand finally rejected under 35 USC §103(a) are unpatentable over Hartman in view of Amazon and in further view of Bezos and in further view of TBTF Log and CatalogAge.

Summary of the Invention

Fig. 1 is a timeline showing the progression of an online customer order from selection of the goods and/or services, through the creation of a quote to the generation of an executable order, according to an embodiment of the present invention. The exemplary timeline 100 of Fig. 1 shows a first customer at 102 and a second customer at 104. Shown at 112 is the time of day, from 8:00 am to 6:00pm. The vertical arrows labeled C1 through C8 denote an action by the

customer, such as clicks of a pointing device. Specifically, C1 through C8 represent purchase requests, by which the customers 102, 104 have selected and have indicated their willingness to purchase the goods and/or services. Such purchase requests C1 through C8 may occur when the Customer 102, 104 clicks on an "Express Order" button.

The method of processing an online purchase request from a customer, according to an embodiment of the present invention, may include the steps of receiving a first online purchase request C1 for purchase of a first item. For example, C1 may denote Customer 1 requesting the purchase of a single item or may denote, for example, a combined purchase request for several items, as shown in Fig. 6. As shown in Fig. 2, the receiving step may be carried out by a Web vendor's server 204, whereas the purchase requests C1 – C8 may be initiated by one or more client computer devices 202. As shown in Fig. 1, in response to purchase request C1, the Web vendor's server 204 may retrieve pre-stored information about the customer. Such pre-stored information may include all information that is necessary to process the customer's purchase request, including the customer's name, address, payment instrument information, billing address, shipping address, etc. When a customer makes a purchase request, as Customer 1 has done at 8:00am at C1, an executable order (an order for goods and/or services that is ready to be sent to an order fulfillment system) is not immediately be generated. Instead, a quote is generated that includes all information necessary to process an executable order for the selected items. As shown in Fig. 1, Quote 1 is generated upon Customer 1 making the purchase request C1. A Quote, according to embodiments of the present invention, is not immediately converted into an executable order and persist for a period of time to allow the customer, other authorized persons and/or a selected automated process or processes to add further items to the generated quote, subtract items therefrom, cancel the quote or to generally modify any or selected payment,

shipping and/or billing parameters. From the customer's point of view, however, a quote may appear as through it is an executable order, in that the customer may be given a confirmation of his or her order, via a link to a Web page generated for the customer for that purpose. The persistence of the quote is shown in Fig. 1 by the shadowed horizontal arrows. According to an embodiment of present invention, a quote lasts at least until a consolidation interval 108 has elapsed. The consolidation interval 108 is a selectable parameter and represents a minimum period of time during which the quote will remain in existence or will remain valid. The consolidation interval 108, according to an embodiment of the present invention is that selectable interval during which a customer may add items to an existing quote, subtract items therefrom or otherwise modify the quote.

Immediately after the consolidation interval 108 or at some time thereafter, the quote will be converted to an executable order that may be sent to an order fulfillment system, unless previously cancelled by the customer or other authorized person. Specifically, an embodiment of the present invention calls for a quote conversion process to convert the quote to an executable order when the quote conversion process (a concurrently running asynchronous program or daemon, for example) determines that the quote has remained unmodified for at least the consolidation interval 108.

The quote conversion process may be configured to run continuously, and quotes may be converted into corresponding executable orders (that may be sent to an order fulfillment system) as soon as the consolidation interval 108 set by the Web vendor elapses after generation of the quote. Alternatively, the quote conversion process may be launched at a selectable time interval. Therefore, the quote conversion process may be launched at a selectable interval (every two

hours in the example of Fig. 1) and converts all existing quotes that have remained unmodified at least for the consolidation interval 108 (1 hour in the example of Fig. 1) into corresponding executable orders.

According to an embodiment of the present invention, purchase requests occurring before an existing quote for that same customer is converted into an executable order may be automatically consolidated with the existing quote. Alternatively, the customer may be given the ability to decide whether additional purchase requests that occur before an existing quote for that same customer is converted into an executable order should be consolidated with the existing quote. When the quote is converted into an executable order the order is sent to an order fulfillment system for processing and execution including, for example, debiting of the payment from customer's designated payment instrument, packaging and shipping of the item(s) selected for purchase. The advantage of initially treating a customer purchase request as a quote and not as an executable order is that the customer or other authorized persons may modify or cancel the quote for a selectable period of time. While an executable order may not be modifiable, a customer may modify a quote by adding an item thereto, subtracting an item therefrom or otherwise changing some of the customer, payment, shipping and/or billing information for that quote. A sales representative or other authorized person may also modify a quote. This may occur because the sales representative may have reviewed the pending quote and determined that the customer qualifies for a price break or other special promotion, for example. Many other situations may be imagined in which a sales representative or other authorized person may legitimately modify a customer's pending quote.

Fig. 3 is a flowchart illustrating an embodiment of the present invention. As shown therein, step S31 calls for the customer to place a purchase request. As shown at S32, the customer's purchase request is treated as a modifiable quote at least until the consolidation interval has elapsed. In step S33, it is determined whether the quote conversion process has determined that the quote generated in step S32 has remained unmodified for at least the consolidation interval 108. If the quote generated in step S32 has not remained unmodified for at least the consolidation interval 108, step S34 may be carried out. Step S34 allows modification(s) and/or cancellation of quote by the customer, sales representative and/or any other authorized person(s). Step S33 may then be repeated until the quote conversion process determines that the quote has remained unmodified for at least the consolidation interval 108. After the quote conversion process determines that the quote has indeed remained unmodified for at least the consolidation interval 108, the quote may be converted into an executable order, as shown at S36. The timing of the determination of step S33 may vary widely, depending upon whether the quote conversion process runs continuously or at a selectable interval, as shown at Fig. 1. An optional step S37 may then be carried out, in which the executable order is sent to an order fulfillment system.

Fig. 4 is a flowchart illustrating another embodiment of the present invention. As shown therein, step S41 determines whether the quote conversion program has launched. If the quote conversion process has launched (as shown in the example of Fig. 1 at 8:00am and every two hours thereafter), the quote conversion process determines whether any pending quotes exist that have remained unmodified for at least the quote conversion interval 108. If no pending quotes exist or if none of the pending quotes have remained unmodified for at least the quote conversion interval 108, the method reverts to step S41. If a quote or quotes exist that have remained

unmodified for at least the quote conversion interval 108, they are converted to executable orders, as shown in S43 and optionally sent to an order fulfillment system, as shown at S44. If the quote conversion process has not launched, (NO branch of S41), it is determined whether a purchase request has been detected, as shown at S45. If not, the method may revert back to S41. If, however, a purchase request has been detected, it is determined in step S46 whether the customer having made the purchase request (clicked on an Express Order button, for example) is recognized (i.e., is a repeat user whose profile, payment instrument, shipping and/or billing information is stored in the Web vendor's server, for example). If the customer is not recognized, the customer may be registered in step S47, meaning that the customer's information may be collected and stored, as shown in Fig. 5. After collecting the customer's information, a quote for the customer may now be created, including at least the information collected and stored in S47, as well as an identification of the item or items selected by the customer through his or her purchase request detected in S45. The method may now revert back to step S41. If the customer having made the purchase request is indeed recognized by the Web vendor's server (or other appropriate system), the YES branch of step S46 leads to a determination of whether there is a pending quote for this customer, as shown at S49. Referring back to Fig. 1, purchase requests C2 and C3, for example, are made during the existence of a pending quote (Quote 1). If the customer is recognized and no pending quote exists for the recognized customer, the method may proceed to step S48, whereupon a quote is created for that customer. If a pending quote exists for the recognized customer, the subject of the customer's purchase request may be added to the pending quote and/or the pending quote may be modified, as outlined in step S50. The method may then revert back to step S41.

Fig. 8 is a flowchart of a method for processing an online purchase request from a customer, according to another embodiment of the present invention. As shown therein, step S81 calls for the customer to place an online purchase request by selecting an item for purchase. In step S82, it is determined whether the customer has requested express checkout. If the customer has requested express checkout, the methodology of the present invention detailed with reference to Fig. 1 may be carried out, as shown at step S83. If express checkout has not been requested, a "shopping cart" (a metaphor for a software construct enabling a customer to aggregate his or her online purchases for immediate or a later purchase) may be created for this customer, as shown at S84. A shopping cart may be saved, deleted, modified or converted into an order by the customer at will. The shopping cart may be persistent until deleted, modified or converted and/or may be persistent for a predetermined or selectable period of time. The customer's purchase request placed in step S81 may be the single item placed in the shopping cart, or the customer may add items thereto, as shown at S85 and S86. As noted above, the customer may also add items to, remove items from, save or otherwise modify the cart (by modifying the quantity or other characteristics of the items in the cart). Therefore, steps S85 and S86 may be replaced with steps to remove or otherwise modify the shopping cart created in step S84.

According to the present invention as shown at S87, the customer may be given the opportunity to express checkout the shopping cart (and by extension, all items within the shopping cart). If the customer chooses to express checkout his or her shopping cart, the functionality detailed with reference to Fig. 1 may be carried out with reference to the entire shopping cart, as shown at S83. If the customer does not wish to express checkout their shopping cart (NO branch of S87), the customer's shopping cart may be processed in a normal (non-express) manner, as shown at S88. Such normal checkout procedures may require the

customer input or confirm his or her name, payment instrument information (such as credit card information, for example), shipping address and/or instructions, may have the customer confirm the items selected for purchase and/or confirm the order before it is created and sent to the OFS, as detailed above. According to embodiments of the present invention, the phrase "normal checkout" is intended to include any and all procedures that the customer may follow or asked to follow in order to place his or her order that differ from the methodology detailed above relative to the express ordering feature of the present invention. Generally, however, the normal checkout step S88 may require the customer to positively carry out additional steps before the order is placed in step S89 and sent to the OFS.

Fig. 9 is a diagram of a list 901, according to an embodiment of the present invention. A list, according to the present invention, includes one or more items that are aggregated together to form a customer selectable, storable and/or modifiable unit. A list, according to the present invention, may include any number of items, each predefined or configurable. Lists, according to embodiments of the present invention, may be ordered (made the subject of a purchase request) following the express ordering procedure and/or placed in a new shopping cart or added to an existing shopping cart that stores other items and/or lists. As shown at Fig. 10, a list 1001 may include an object (or several objects) 1002. An object, according to the present invention, may include or more items and/or one or more lists of items and/or lists (in other words, a list of lists). The depth (the number of lists within lists) of such embedded lists within an object, according to the present invention, is unlimited. As shown in exemplary Fig. 10, a list 1001 may include one or more objects, such as object 1002. As shown, object 1002 may include one or more individual items (item 1, item 2) and one or more lists, such as list 1003. In turn, list 1003 may include individual items (not shown) and/or other lists and/or objects (also not shown). In addition to the

object 1002, the list 1001 may include individual items such as items 3, 4 and 5. The lists and/or objects described and depicted herein may be created and/or modified by either the online customer and/or the online vendor. Vendor-created lists may offer vendors a ready mechanism for promotional bundling of items and/or services to be offered to their customers.

Fig. 11 is a flowchart of another aspect of the present invention, in which a customer part, item and/or list identifier may be mapped to a vendor part number, item number and/or list or object identifier. The mapping may advantageously occur transparently to the customer, who only need input and/or select his or her own designation (or the corporate's designation) for the desired part, item, list and/or object identifier from the vendor's Web site as shown at S101. At S112, the identifier of the inputted and/or selected part, item, list and/or object mapped onto a corresponding vendor part, item, list and/or object. The vendor may then retrieve the vendor part, item, list and/or object identifier corresponding to the inputted and/or selected customer identifier, as shown at S113. Such vendor identifier may then be express ordered and/or may become a part of the customer's shopping cart. The functionality illustrated in Fig. 11 and described immediately above enables both the customer and the vendor to independently assign different identifiers for the same part, item, list and/or object.

Cited Art

The prior art rejections, relying upon 35 USC §103(a), are based upon various combinations of U.S. patent 5,960,411 to Hartman et al. (hereafter, Hartman), a printout of selected pages of the Amazon.com website (hereafter, Amazon), US patent 6,029,141 to Bezos et al. (hereafter Bezos), Technology, Getting personal online article of CatalogAge of May 2000 (hereafter, CatalogAge article) and TBTF Log, week of 1999-11-28 printout (hereafter, TBTF).

Issues

The issues on appeal are whether claims 1, 4-7, 9-24, 27-30, 32-47, 50-53 and 55-69 are unpatentable over Hartman in view of Amazon, and whether claims 3, 26 and 49 are unpatentable over Hartman in view of Amazon and in further view of Bezos and in further view of TBTF Log and CatalogAge.

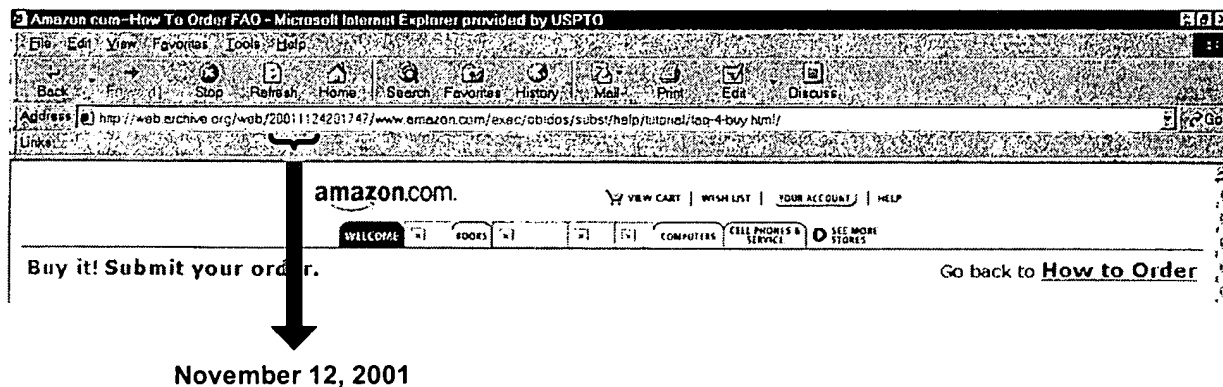
Grouping of Claims

Arguments are presented below with respect to the independent claims 1, 24 and 47. The dependent claims stand or fall together with the independent claims from which they depend.

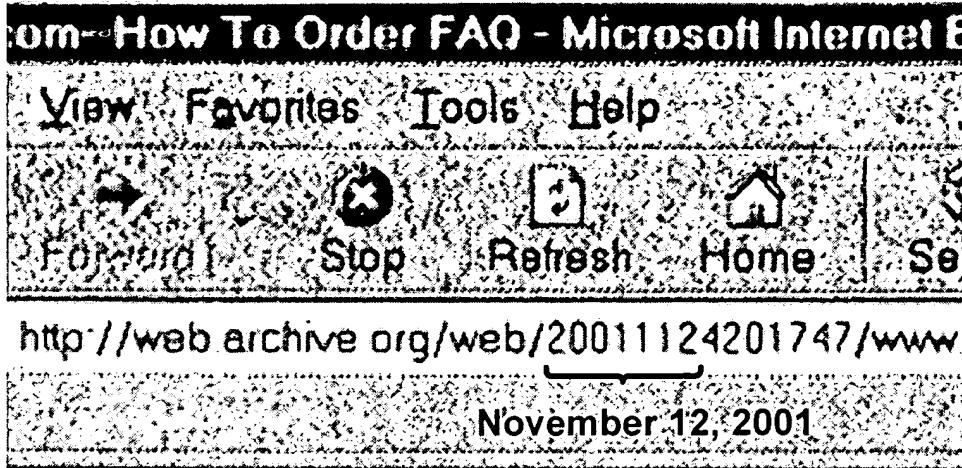
Arguments

At the outset, it is respectfully submitted to the Board that many of the Web pages in the Amazon reference are dated after the filing date of April 10, 2001 of the present application and are thus unavailable as prior art against the pending claims.

For example, page 10 of the Amazon reference is a printout of an amazon.com web page dated November 12, 2001:



Below is an enlarged view of the date of this web page.



As this web page was originally published after the filing date of the present application, it cannot be prior art to this application or support a 35 USC §103(a) rejection. Also unavailable as prior art as against the claims of the present application are:

page 11 of Amazon, dated Nov. 12, 2001;

page 12 of Amazon, featuring the copyright notice "©1996-2002, Amazon.com, Inc. or its affiliates" at the bottom of the page;

page 13 of Amazon, dated Jan. 25, 2002;

page 17 of Amazon, dated June 02, 2001;

page 11 of Amazon, dated Nov. 12, 2001;

page 19 of Amazon, dated Nov. 12, 2001;

page 20 of Amazon, dated Oct. 02, 2002;

page 22 of Amazon, dated June 03, 2001;

page 28 of Amazon, dated July 08, 2001, and

page 28 of Amazon, dated July 08, 2001.

All of these web pages are dated after the filing date of April 10, 2001 of the present application and are thus unavailable to the Office for the purposes of a prior art rejection of the pending claims of the present application. Indeed, the Examiner relied upon printouts hyperlinked from the web-archive.org website (reproduced in the Appendix B submitted herewith) for dates

from 1996 to the then present date (at which the search was conducted at the USPTO) of October 2, 2002. Thereafter, the Examiner did not appear to discriminate between those archived web pages that were created before the filing date of the present application and those that were created after the filing date of the present application.

THE PATENT AND TRADEMARK OFFICE HAS FAILED TO DEMONSTRATE OBVIOUSNESS OVER THE APPLIED HARTMAN-AMAZON COMBINATION

The arguments will be based upon the Hartman reference and that portion of the Amazon reference that is, in fact, prior art to the present application as well as the other non-patent references cited in the outstanding Final Office Action. The same arguments also apply to the computer system and media claims on appeal and are expressly incorporated herein by reference, as if repeated in full.

The applied combination of references does not teach or suggest the claimed step of:

"responsive to receiving the first online request, providing a bifurcated order processing route that requests the customer to choose a first order processing route or a second order processing route, the first order processing route causing the first online purchase request to be processed according to an express processing procedure that requires no further input by the customer to execute the first online purchase request, the second order processing route causing the first online purchase request to be placed in a shopping cart that allows one or more additional purchase requests for additional items to be placed therein, the second order processing route affording the customer an opportunity to cause execution of the first and any additional purchase requests placed in the shopping card to be processed according to the express ordering processing that requires no further input by the customer to execute."

Aspects of the invention defined by independent claims 1, 24 and 47 are shown in Fig. 8 of the present application. Fig. 8, at step S83, incorporates Fig. 1 of the present invention. As shown, the claimed first order route of the claimed bifurcated order processing route includes the "YES" branch of step S82, whereas the claimed second order processing route includes the "NO" branch of step S82. The "NO" branch, as claimed, causes the first (and any subsequent) online purchase

request to be placed in a shopping cart, as shown at S84, S85 and S86. As shown at S87, the second order processing route affords the customer the opportunity to cause execution of the first and any additional purchase requests placed in the shopping card to be processed according to the express ordering processing that requires no further input by the customer to execute. If the customer does not avail himself or herself with the claimed opportunity, the contents of the shopping cart are checked out using a normal checkout procedure and the order is placed (sent to OFS), as shown at S88 and S89. The claimed bifurcated order-processing route is only disclosed in the present application and is not taught or suggested in the applied combination.

The Hartman et al. reference, either taken alone or in combination with the Amazon reference (to the limited extent that it is prior art to the present application) does not teach or suggest a bifurcated order processing route, whereby customers are requested to choose a first or a second order processing route, in which the second order processing route affords the customer the opportunity to cause express ordering processing on their shopping cart, as claimed. The Hartman reference (even when considered in combination with the Amazon secondary reference, as developed in detail below) does not teach or suggest any mechanism by which customers are requested (as explicitly recited in claims 1, 24 and 47) to choose the a first or second order processing route, after which items placed in a shopping cart may be processed according to an express ordering processing that requires no further input by the customer to execute, again as required by the pending independent claims.

Hartman discloses enabling a single action (usually, a single mouse click) ordering functionality. After selecting an item and single action ordering, the customer is given an opportunity to review change the single action order. Col. 5, lines 3-9. To help minimize shipping costs and purchaser confusion, the server system may combine various single-action

orders. Col 5, lines 26-28. Hartman's server system may also combine single action orders that are placed within a certain time period (e.g., 90 minutes). Orders placed may be combined or divided, based upon availability of the items ordered. Col. 4, lines 47-55, Col. 7, lines 24-56. Hartman then teaches an algorithm for expedited order selection. The stated goal for this algorithm is to reduce the shipping costs. Col. 8, line 1 through Col. 9, line 7.

In the background section of this reference, Hartman speaks of the drawbacks inherent in the shopping cart model:

"Although the shopping cart model is very flexible and intuitive, it has a downside in that it requires many interactions by the purchaser. For example, the purchaser selects the various items from the electronic catalog, and then indicates that the selection is complete. The purchaser is then presented with an order Web page that prompts the purchaser for the purchaser-specific order information to complete the order. That Web page may be prefilled with information that was provided by the purchaser when placing another order. The information is then validated by the server computer system, and the order is completed. Such an ordering model can be problematic for a couple of reasons. If a purchaser is ordering only one item, then the overhead of confirming the various steps of the ordering process and waiting for, viewing, and updating the purchaser-specific order information can be much more than the overhead of selecting the item itself. This overhead makes the purchase of a single item cumbersome. Also, with such an ordering model, each time an order is placed sensitive information is transmitted over the Internet. Each time the sensitive information is transmitted over the Internet, it is susceptible to being intercepted and decrypted." Col. 2, lines 26-48.

Thereafter, Hartman makes it clear that the single-action ordering scheme disclosed therein is not related to the shopping cart model whose disadvantages are outlined in the background section. Indeed, specifically addressing the disadvantages of the shopping cart model outlined in the Background section, Hartman's claim 1 recites that the item ordered via the single-action model is *"ordered without using a shopping cart ordering model."* Hartman claim 1, lines 35-36). In addition, Hartman's claim 11, at lines 28-30, recites *"...whereby the item is ordered independently of a shopping cart model and the order is fulfilled to complete a purchase of the item."*

Fig. 1A of Hartman makes it abundantly clear, moreover, that the 1-click ordering scheme disclosed therein is designed for ordering an item - and not for processing the contents of a shopping cart. Indeed, the reference to 1-click in Hartman's Fig. 1A is grouped under the reference numeral 103, which relates to purchasing a single item, as opposed to reference numeral 102, which relates to the shopping cart model. See Col. 4 lines 4-33. There does not appear to be any teaching or suggestion in the Hartman reference of applying the 1-click model to the contents of a shopping cart. Such would be contrary to the claims in this patent, and would not address any of the disadvantages identified in the Background section thereof. It is to be noted that Hartman is very specific as to the use of the disclosed single action or "1-click" ordering scheme: "This example single-action ordering section allows the purchaser to specify with a single click of a mouse button to order the described item." Col. 4, lines 31-33 (Emphasis Added). Hartman pointedly does not state or suggest that the single action ordering section allows the purchaser to specify with a single click of a mouse button to order the items in the shopping cart - and explicitly teaches away from such a concept, for the reasons identified in Hartman's own Background section.

In direct contrast, the independent claims on appeal recite:

"...the second order processing route affording the customer an opportunity to cause execution of the first and any additional purchase requests placed in the shopping card to be processed according to the express ordering processing that requires no further input by the customer to execute."

Recognizing the above-detailed shortcomings of the Hartman reference, the Office has previously explicitly stated that the Hartman reference fails to teach such claimed steps and features. Indeed, that the Hartman et al. reference does not teach the presently claimed second order processing route whereby the customer is afforded the opportunity to cause execution of

the first and any additional purchase requests placed in the shopping cart to be processed according to the express ordering processing that requires no further input by the customer has been, in fact, acknowledged by the Examiner, at page 5, first full paragraph of the Office Action of June 18, 2003, which states: "*Hartman et al. does not disclose the automatic checking out of the shopping cart*". The Office Action continues and states: "However, Hartman et al. discloses that in some models when a purchaser selects any one item, then that item is "checked out" by automatically prompting the user for the billing and shipment information (col. 2, lines 24-47)." It is respectfully submitted that checking out a shopping cart by prompting the user for billing and shipment information does not teach or suggest (whether considered singly or in combination with the secondary references) the claimed limitation of "...purchase requests placed in the shopping card to be processed according to the express ordering processing that requires no further input by the customer to execute", as claimed in the independent claims. How can Hartman be said to teach processing a shopping cart according to the express ordering processing that requires no further input by the customer to execute, when Hartman explicitly states that the customer must input billing and shipment information to process a shopping cart? The answer is that it cannot.

As this subject matter has been shown and acknowledged by the Office to be missing from the primary reference, it falls then to the applied secondary reference to Amazon to supply the missing teachings, suggestion and/or to provide the requisite motivation to the person of ordinary skill to modify the system disclosed by Hartman to achieve or to somehow suggest the claimed inventions. As the arguments below make clear, such teachings or suggestions are not present in Amazon.

THE AMAZON REFERENCE DOES NOT TEACH OR SUGGEST THE CLAIMED BIFURCATED ORDER PROCESSING ROUTE THAT IS ACKNOWLEDGED TO BE MISSING FROM THE HARTMAN REFERENCE

The Amazon reference, whether considered singly or in combination with the Hartman reference does not teach or suggest the claimed invention. In particular, the Amazon reference does not teach any functionality that would allow "the first and any additional purchase requests placed in the shopping card to be processed according to the express ordering processing that requires no further input by the customer to execute", as required by claim 1. This is believed to be apparent from a detailed examination of the Amazon reference, as shown immediately below:

Pages 2-3 are screen shots of the Amazon welcome page as of October 13, 1999. No teaching or suggestion of the above-excerpted claimed subject matter is present therein.

Pages 4-6 is an index of the Amazon site and does not contain any material related to ordering and does not teach or suggest the inventions of claims 1, 24 or 47.

Page 7 includes links for "How to Order", "1-Click" and "Your Account" but no teaching or suggestion of any method that requests the customer to choose the first or second claimed order processing routes - or the claimed functionality of such order processing routes.

Page 8 is a scrolled-down version of Page 7.

Page 9 is a Guided Tour and includes a "Frequently Asked Questions" section that includes links for "How does the Shopping Cart work?" and "What happens when I am ready to place my order?" No teaching or suggestion of the inventions of claims 1, 24 and 47 is contained therein.

Page 10 of Amazon is a printout of an amazon.com web page as it existed after the filing date of the present application, rendering this page unavailable as a prior art reference.

Page 11 of Amazon is a duplicate of page 10 and is a printout of an amazon.com web page as it existed after the filing date of the present application, rendering this page unavailable as a prior art reference.

Page 12 of Amazon is a printout of an amazon.com web page as it existed after the filing date of the present application, rendering this page unavailable as a prior art reference.

Page 13 of Amazon is a printout of an amazon.com web page as it existed after the filing date of the present application, rendering this page unavailable as a prior art reference.

Page 14 is another welcome page, no more relevant to the claimed invention than are pages 2-3.

Page 15 contains links to "Using the Shopping Cart" and "Ordering via 1-Click". However, this page does not teach or suggest the first or second order processing routes as claimed and does not supply or suggest the teachings acknowledged to be missing from the Hartman reference.

Page 16 is a scrolled down version of page 15 and does not contain any teachings relevant to claims 1, 24 or 47, even when considered in view of the primary reference to Hartman.

Page 17 of Amazon is a printout of an amazon.com web page as it existed after the filing date of the present application, rendering this page unavailable as a prior art reference. Moreover, page 17 of amazon.com plainly does not include any section that is entitled "selecting order processing route" or that discusses any selection of any order-processing route, contrary to the Office's assertion on page 5 of the Office Action of June 18, 2003.

Page 18 of Amazon is a printout of an amazon.com web page as it existed after the filing date of the present application, rendering this page unavailable as a prior art reference.

Page 19 of Amazon is a printout of an amazon.com web page as it existed after the filing date of the present application, rendering this page unavailable as a prior art reference.

Page 20 of Amazon is a printout of an amazon.com web page as it existed after the filing date of the present application, rendering this page unavailable as a prior art reference.

Page 21 outlines how items may be added to an existing order, but does not contain any

suggestion or teaching of "the second order processing route causing the first online purchase request to be placed in a shopping cart that allows one or more additional purchase requests for additional items to be placed therein, the second order processing route affording the customer an opportunity to cause execution of the first and any additional purchase requests placed in the shopping card to be processed according to the express ordering processing that requires no further input by the customer to execute", as recited in claim 1 and as similarly recited in claims 24 and 47. Indeed, there is not teaching or suggestion of any functionality drawn to affording the customer the opportunity to cause execution of any purchase requests placed in the shopping card to be processed according to the claimed express ordering procedure. Allowing customers to add items to an order does not rise to the level of a teaching or a suggestion of the claimed invention.

Page 22 of Amazon is a printout of an amazon.com web page as it existed after the filing date of the present application, rendering this page unavailable as a prior art reference.

Page 23 is a page that presumably appears when a customer attempts to checkout an empty shopping cart.

Page 24 and 25 are the May 10, 2000 amazon.com welcome page and do not contain any teachings relevant to the claimed inventions.

Pages 26-27 are identical to pages 24-25.

Page 28 of Amazon is a printout of an amazon.com web page as it existed after the filing date of the present application, rendering this page unavailable as a prior art reference.

Page 29 of Amazon is a printout of an amazon.com web page as it existed after the filing date of the present application, rendering this page unavailable as a prior art reference.

Lastly, page 30 details amazon.com's shipping and return policies and is irrelevant to the claimed invention.

Even in combination with the Hartman reference, the 30-page amazon.com printout (to the limited extent to which it is available as a valid prior art reference), does not teach or suggest any of the limitations of claims 1, 24 and 47. There are insufficient grounds in the Hartman and Amazon references, for a finding that the claimed inventions would have, somehow, emerged from a collective consideration of both documents - especially when the subject matter acknowledged to be missing from the primary reference is not even mentioned in the secondary reference.

In further support of the rejection of the claims and in reference to the Amazon reference, the Office states that Amazon discloses allowing "customers to make purchases over the internet" and giving customers "a choice to continue shopping or checkout", as noted on page 5 of the outstanding Final Office Action. However, such teaching also does not rise to the level of a teaching or suggestion of the claimed invention, and specifically does not rise to the level of a teaching or suggestion of the claimed bifurcated order-processing route that includes the claimed first and second order processing routes, even in combination with the primary reference to Hartman. It is unsurprising that the Amazon reference teaches that customer can either continue shopping or checkout, as without such functionality, the shopping cart model would simply not work. It is believed, therefore, that the Amazon printouts relied upon in 35 USC §103(a) rejections of the claims are nothing more than historical printouts of the amazon.com web site that have no particular relevance to the claimed inventions of claims 1, 24 and 47. The deficiencies detailed above in the applied combination of references forming the basis of the outstanding obviousness rejections are believed sufficiently significant as to warrant the reversal of the obviousness rejections of the pending claims.

The TBTF Log publication for the week of November 28, 1999 cites a WSJ article to the

effect that a judge had enjoined Barnesandnoble.com from using 1-Click ordering. The article also stated that Barnesandnoble.com (hereafter, BN) would accelerate deployment of an "Express Checkout" procedure. However, no further details regarding this "Express Checkout" procedure are disclosed in this document. That this reference refers to some unknown procedure called "Express Checkout" does not, in itself, rise to the level of a teaching of the claimed invention, whether considered singly or in combination with any of the other applied references. Indeed, the article does not teach or suggest exactly what is BN's "Express Checkout" - it is only the name of some checkout procedure that is supposedly an improvement (according to BN) over Amazon's 1-Click. This reference does not say what BN's "Express Checkout" is, does not say how it works, or any substantive functional details thereof. As such, the TBTF article does not more than teach that BN were supposedly developing something called "Express Checkout" that was supposedly an improvement over Amazon's 1-Click procedure. It follows that the TBTF article cannot be relied on for a teaching of requesting customers to select the claimed order-processing route, as claimed. Therefore, combining the TBTF article and the primary reference to amazon.com (which admittedly does not teach requesting customers to select an order processing route) would not teach or suggest the claimed inventions to those of skill in this art.

The Catalog Age article "Getting Personal Online" is similarly uninformative regarding the claimed inventions. Here also, the article does not teach any thing more than the phrase "express checkout", and does not teach anything substantive, other than the phrase presumably refers to some fast checkout. How that is done, the article does not say. This article does also say that PlanetRx.com's has introduced "MyShoppingList". Using "MyShoppingList", PlanetRx.com's customers can have their products ready in a shopping cart when they arrive at the store, so that all they have to do is "go through the express checkout". Again, the phrase "express checkout" is

nothing more than terminology that is similar to that used in the claims and does not teach or suggest any of the steps in claims 1, 24 or 47. Notably absent from this article or from the primary reference or from any combination thereof is any teaching or suggestion of the customer choosing "a first order processing route or a second order processing route, the first order processing route causing the first online purchase request to be processed according to an express processing procedure that requires no further input by the customer to execute the first online purchase request, the second order processing route causing the first online purchase request to be placed in a shopping cart that allows one or more additional purchase requests for additional items to be placed therein, the second order processing route affording the customer an opportunity to cause execution of the first and any additional purchase requests placed in the shopping card to be processed according to the express ordering processing that requires no further input by the customer to execute", as claimed. That similar terminology (i.e., "express checkout") is used both in the claims and a printed publication, absent some teaching or suggestion of the claimed method, are believed to constitute insufficient grounds on which to support a §103(a) rejection of the pending claims.

The same comments also apply to the June 1, 2000 Catalog Age article entitled "Show Websites". Here, the phrase "express checkout" is again used, but nothing in this article tells the reader what, exactly, "express checkout" is. As such, this article also does not remedy the shortcomings of the primary reference and does not teach or suggest the claimed invention.

CONCLUSION

The applied combination of references do not teach or suggest the claimed inventions. None of the claims are obvious in view of the applied combinations. Therefore, the appellant

respectfully requests a reversal of the outstanding rejections and a finding that the pending claims are allowable. An oral hearing is not requested.

Respectfully submitted,

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Date: December 3, 2003

APPENDIX A

CLAIMS ON APPEAL

1. **(Previously Presented)** A method of processing an online purchase request from a customer to a vendor, comprising the steps of:

receiving a first online purchase request for a first item;

responsive to receiving the first online request, providing a bifurcated order processing route that requests the customer to choose a first order processing route or a second order processing route, the first order processing route causing the first online purchase request to be processed according to an express processing procedure that requires no further input by the customer to execute the first online purchase request, the second order processing route causing the first online purchase request to be placed in a shopping cart that allows one or more additional purchase requests for additional items to be placed therein, the second order processing route affording the customer an opportunity to cause execution of the first and any additional purchase requests placed in the shopping card to be processed according to the express ordering processing that requires no further input by the customer to execute.

2. **(Cancelled)**

3. **(Previously Presented)** The method of Claim 1, further including a step of enabling the customer to create a list that includes the first and at least one second item, the list being persistently stored to enable later retrieval and use.

4. **(Original)** The method of Claim 1, wherein the first item includes a uniquely identified and pre-stored list of goods and/or services.

5. **(Original)** The method of Claim 4, wherein the list includes an object, the object including at least one of another list and item.

6. **(Original)** The method of Claim 1, wherein the first online purchase request is received from an automated process configured to generate the first online purchase request at one of a selectable date and interval.

7. **(Original)** The method of Claim 1, wherein the customer identifies the first item using a unique identifier used by the customer and wherein the vendor maps the identifier used by the customer to a corresponding unique identifier used by the vendor.

8. **(Cancelled)**

9. **(Original)** The method of Claim 1, further including the steps of:

generating a first quote that includes the processed first online purchase request, the first quote including at least one of an identification of the first item and an identification of the shopping cart;

enabling modifications to be made to the first quote, the first quote persisting at least until a consolidation interval has elapsed, and

carrying out the converting step by converting the first quote into the first executable order when a quote conversion process determines that the first quote has remained unmodified at least for the consolidation interval.

10. **(Original)** The method of Claim 1, wherein the first quote generating step includes a step of generating an order status Web page that is viewable by the customer, the order status Web page displaying selected details of the first quote.

11. **(Original)** The method of Claim 10, wherein the order status Web page is configured to refer to the first quote as a pending order.
12. **(Original)** The method of Claim 9, wherein the enabling step allows at least one of the customer, a selected process and at least one authorized person to modify the first quote.
13. **(Original)** The method of Claim 12, wherein the at least one authorized person includes the customer and a sales representative.
14. **(Original)** The method of Claim 9, wherein the quote conversion process is launched at a selectable interval.
15. **(Original)** The method of Claim 14, wherein the consolidation interval is measured from a time at which the quote conversion process is launched.
16. **(Original)** The method of Claim 9, wherein the quote conversion process runs continuously.
17. **(Previously Presented)** The method of Claim 1, further comprising the step of converting the first and any second purchase request into an executable order and sending the executable order to an order fulfillment system.
18. **(Original)** The method of Claim 9, further comprising the steps of:
receiving a second online purchase request for a second item from the customer, and
adding the second item to the first quote when the second online purchase request is received before the first quote is converted into the first order.
19. **(Original)** The method of Claim 9, further comprising the steps of:

receiving a second online purchase request for a second item from the customer, and
adding the second item to the first quote when the quote conversion process determines that the first quote has remained unmodified for a period of time that is less than the consolidation interval.

20. **(Original)** The method of Claim 9, further comprising the steps of:
receiving a second online purchase request for a second item from the customer, and
generating a second quote that includes an identification of the second item and the retrieved information when the quote conversion process determines that the first quote has remained unmodified for a period of time greater than the consolidation interval.

21. **(Original)** The method of Claim 9, wherein the quote conversion process determines a difference between a time at which a last modification to the first quote was made and a current time and converts the quote to the first order when the difference is greater than the consolidation interval.

22. **(Original)** The method of Claim 9, further comprising the step of sending a message to the customer when the first quote is converted into the first order.

23. **(Original)** The method of claim 22, wherein the message includes one of an email, an instant message, a voice message and a video message.

24. **(Previously Presented)** A computer system configured for processing an online purchase request from a customer to a vendor, comprising:

at least one processor;

at least one data storage device;

a plurality of processes spawned by said at least one processor, the processes including processing logic for:

receiving a first online purchase request for a first item;

responsive to receiving the first online request, providing a bifurcated order processing route that requests the customer to choose a first order processing route or a second order processing route, the first order processing route causing the first online purchase request to be processed according to an express processing procedure that requires no further input by the customer to execute the first online purchase request, the second order processing route causing the first online purchase request to be placed in a shopping cart that allows one or more additional purchase requests for additional items to be placed therein, the second order processing route affording the customer an opportunity to cause execution of the first and any additional purchase requests placed in the shopping card to be processed according to the express ordering processing that requires no further input by the customer to execute.

25. **(Cancelled)**

26. **(Previously Presented)** The computer system of Claim 24, further including a process for carrying out a step of enabling the customer to create a list that includes the first and at least one second item, the list being persistently stored to enable later retrieval and processing according to the first or second order processing routes.

27. **(Original)** The computer system of Claim 24, wherein the first item includes a uniquely identified and pre-stored list of goods and/or services.

28. **(Original)** The computer system of Claim 27, wherein the list includes an object, the object including at least one of another list and item.

29. **(Original)** The computer system of Claim 24, wherein the first online purchase request is received from an automated process configured to generate the first online purchase request at one of a selectable date and interval.

30. **(Original)** The computer system of Claim 24, wherein the customer identifies the first item using a unique identifier used by the customer and wherein the vendor maps the identifier used by the customer to a corresponding unique identifier used by the vendor.

31. **(Cancelled)**

32. **(Original)** The computer system of Claim 24, further including the processes for carrying out the steps of :

generating a first quote that includes the processed first online purchase request, the first quote including at least one of an identification of the first item and an identification of the shopping cart;

enabling modifications to be made to the first quote, the first quote persisting at least until a consolidation interval has elapsed, and

carrying out the converting step by converting the first quote into the first executable order when a quote conversion process determines that the first quote has remained unmodified at least for the consolidation interval.

33. **(Original)** The computer system of Claim 32, wherein the first quote generating step includes a step of generating an order status Web page that is viewable by the customer, the order status Web page displaying selected details of the first quote.

34. **(Original)** The computer system of Claim 33, wherein the order status Web page is configured to refer to the first quote as a pending order.

35. **(Original)** The computer system of Claim 32, wherein the enabling step allows at least one of the customer, a selected process and at least one authorized person to modify the first quote.

36. **(Original)** The computer system of Claim 35, wherein the at least one authorized person includes the customer and a sales representative.

37. **(Original)** The computer system of Claim 32, wherein the quote conversion process is launched at a selectable interval.

38. **(Original)** The computer system of Claim 37, wherein the consolidation interval is measured from a time at which the quote conversion process is launched.

39. **(Original)** The computer system of Claim 32, wherein the quote conversion process runs continuously.

40. **(Previously Presented)** The computer system of Claim 24, further comprising the step of converting the first and any additional purchase requests into an executable order and sending the executable order to an order fulfillment system.

41. **(Original)** The computer system of Claim 32, further comprising the steps of:
receiving a second online purchase request for a second item from the customer, and
adding the second item to the first quote when the second online purchase request is received before the first quote is converted into the first order.

42. **(Original)** The computer system of Claim 32, further comprising the steps of:

receiving a second online purchase request for a second item from the customer, and

adding the second item to the first quote when the quote conversion process determines that the first quote has remained unmodified for a period of time that is less than the consolidation interval.

43. **(Original)** The computer system of Claim 32, further comprising processes for carrying out the steps of:

receiving a second online purchase request for a second item from the customer, and

generating a second quote that includes an identification of the second item and the retrieved information when the quote conversion process determines that the first quote has remained unmodified for a period of time greater than the consolidation interval.

44. **(Original)** The computer system of Claim 32, wherein the quote conversion process determines a difference between a time at which a last modification to the first quote was made and a current time and converts the quote to the first order when the difference is greater than the consolidation interval.

45. **(Original)** The computer system of Claim 32, further comprising a process for carrying out the step of sending a message to the customer when the first quote is converted into the first order.

46. **(Original)** The computer system of Claim 45, wherein the message includes one of an email, an instant message, a voice message and a video message.

47. **(Previously Presented)** A machine-readable medium having data stored thereon representing sequences of instructions which, when executed by computing device,

causes said computing device to process an online purchase request from a customer to a vendor by performing the steps of:

receiving a first online purchase request for a first item;

responsive to receiving the first online request, providing a bifurcated order processing route that requests the customer to choose a first order processing route or a second order processing route, the first order processing route causing the first online purchase request to be processed according to an express processing procedure that requires no further input by the customer to execute the first online purchase request, the second order processing route causing the first online purchase request to be placed in a shopping cart that allows one or more additional purchase requests for additional items to be placed therein, the second order processing route affording the customer an opportunity to cause execution of the first and any additional purchase requests placed in the shopping card to be processed according to the express ordering processing that requires no further input by the customer to execute.--

48. **(Cancelled)**

49. **(Previously Presented)** The medium of Claim 47, further including a step of enabling the customer to create a list that includes the first and at least one second item, the list being persistently stored to enable later retrieval and processing according to the first or second order processing routes.--

50. **(Original)** The medium of Claim 47, wherein the first item includes a uniquely identified and pre-stored list of goods and/or services.

51. **(Original)** The medium of Claim 50, wherein the list includes an object, the object including at least one of another list and item.

52. **(Original)** The medium of Claim 47, wherein the first online purchase request is received from an automated process configured to generate the first online purchase request at one of a selectable date and interval.

53. **(Original)** The medium of Claim 47, wherein the customer identifies the first item using a unique identifier used by the customer and wherein the vendor maps the identifier used by the customer to a corresponding unique identifier used by the vendor.

54. **(Cancelled)**

55. **(Original)** The medium of Claim 47, further including the steps of:

generating a first quote that includes the processed first online purchase request, the first quote including at least one of an identification of the first item and an identification of the shopping cart;

enabling modifications to be made to the first quote, the first quote persisting at least until a consolidation interval has elapsed, and

carrying out the converting step by converting the first quote into the first executable order when a quote conversion process determines that the first quote has remained unmodified at least for the consolidation interval.

56. **(Original)** The medium of Claim 55, wherein the first quote generating step includes a step of generating an order status Web page that is viewable by the customer, the order status Web page displaying selected details of the first quote.

57. **(Original)** The medium of Claim 56, wherein the order status Web page is configured to refer to the first quote as a pending order.

58. **(Original)** The medium of Claim 55, wherein the enabling step allows at least one of the customer, a selected process and at least one authorized person to modify the first quote.

59. **(Original)** The medium of Claim 58, wherein the at least one authorized person includes the customer and a sales representative.

60. **(Original)** The medium of Claim 55, wherein the quote conversion process is launched at a selectable interval.

61. **(Original)** The medium of Claim 60, wherein the consolidation interval is measured from a time at which the quote conversion process is launched.

62. **(Original)** The medium of Claim 55, wherein the quote conversion process runs continuously.

63. **(Previously Presented)** The medium of Claim 47, further comprising the step of converting the first and any additional purchase requests into an executable order and sending the executable order to an order fulfillment system.

64. **(Original)** The medium of Claim 47, further comprising the steps of:
receiving a second online purchase request for a second item from the customer, and
adding the second item to the first quote when the second online purchase request is received before the first quote is converted into the first order.

65. **(Original)** The medium of Claim 47, further comprising the steps of:
receiving a second online purchase request for a second item from the customer, and

adding the second item to the first quote when the quote conversion process determines that the first quote has remained unmodified for a period of time that is less than the consolidation interval.

66. **(Original)** The medium of Claim 47, further comprising the steps of:
receiving a second online purchase request for a second item from the customer, and
generating a second quote that includes an identification of the second item and the retrieved information when the quote conversion process determines that the first quote has remained unmodified for a period of time greater than the consolidation interval.

67. **(Original)** The medium of Claim 47, wherein the quote conversion process determines a difference between a time at which a last modification to the first quote was made and a current time and converts the quote to the first order when the difference is greater than the consolidation interval.

68. **(Original)** The medium of Claim 47, further comprising the step of sending a message to the customer when the first quote is converted into the first order.

69. **(Original)** The medium of Claim 68, wherein the message includes one of an email, an instant message, a voice message and a video message.



APPENDIX B

Searching Page: An online Internet Explorer provided by CNET

http://web.archive.org/web/1996/10/02/www.amazon.com

Wednesday, October 2, 2002

Enter Web Address: http:// All

Searched for <http://www.amazon.com> 824 Results

Note: some duplicates are not shown. Small * denotes when site was updated.

Search Results for Jan 01, 1996 - Oct 02, 2002

1996	1997	1998	1999	2000	2001	2002
Dec 02, 1996 *	Jan 25, 1997	Feb 29, 2000 *	Jan 07, 2001 *	Jan 23, 2002		
Dec 07, 1996	Feb 08, 1997	Mar 01, 2000	Apr 05, 2001 *	Jan 25, 2002		
Dec 12, 1996	Feb 09, 1997	Mar 02, 2000	May 03, 2001			
	Feb 18, 1997	Mar 03, 2000	May 04, 2001			
	Apr 22, 1997	Mar 04, 2000	May 05, 2001			
	Apr 23, 1997	Apr 07, 2000	May 06, 2001			
	Apr 29, 1997	Apr 08, 2000	May 07, 2001			
	Apr 30, 1997	May 08, 2000	May 08, 2001			
	May 07, 1997	May 08, 2000	May 09, 2001			
	Oct 13, 1997 *	May 10, 2000	May 10, 2001			
		May 11, 2000	May 11, 2001			
		May 12, 2000	May 12, 2001			
		May 14, 2000	May 13, 2001			
		May 18, 2000	May 14, 2001			
		May 19, 2000	May 15, 2001			
		May 20, 2000	May 16, 2001			
		Jun 09, 2000	May 17, 2001			
		Jun 11, 2000	May 18, 2001			
		Jun 19, 2000	May 18, 2001			
		Jun 20, 2000	May 19, 2001			
		Jun 21, 2000	May 20, 2001			
		Jun 22, 2000	May 22, 2001			
		Jun 26, 2000	May 23, 2001			
		Jul 07, 2000	May 24, 2001			
		Jul 11, 2000	May 25, 2001			
		Aug 08, 2000	May 26, 2001			
		Aug 15, 2000	May 27, 2001			
		Aug 28, 2000	May 28, 2001			
		Sep 01, 2000	May 29, 2001			
		Sep 25, 2000	May 31, 2001			
		Oct 03, 2000	Jun 01, 2001			
		Oct 04, 2000	Jun 02, 2001			
		Oct 08, 2000	Jun 03, 2001			
		Oct 10, 2000	Jun 05, 2001			
		Oct 17, 2000 *	Jun 06, 2001			
		Oct 18, 2000 *	Jun 07, 2001			
		Oct 18, 2000 *	Jun 08, 2001			
		Oct 18, 2000 *	Jun 09, 2001			
		Oct 18, 2000 *	Jun 10, 2001			
		Oct 18, 2000 *	Jun 10, 2001			
		Oct 18, 2000 *	Jun 14, 2001			
		Oct 18, 2000 *	Jun 15, 2001			
		Oct 18, 2000 *	Jun 16, 2001			
		Oct 18, 2000 *	Jun 17, 2001			
		Oct 18, 2000 *	Jun 18, 2001			
		Oct 18, 2000 *	Jun 19, 2001			
		Oct 18, 2000 *	Jun 20, 2001			
		Oct 18, 2000 *	Jun 21, 2001			
		Oct 18, 2000 *	Jun 22, 2001			
		Nov 10, 2000	Jun 23, 2001			
			Jun 25, 2001			
			Jun 26, 2001			
			Jun 27, 2001			
			Jun 28, 2001			
			Jun 29, 2001			
			Jun 30, 2001			
			Jul 01, 2001			
			Jul 02, 2001			

Wednesday, October 2, 2002

Information on
Amazon.com Inc.

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